



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



OCT 01 2015

Ms. Jennifer Hart
California Resources Production Corp
9600 Ming Ave., Suite 300
Bakersfield, CA 93311

**Re: Notice of Minor Title V Permit Modification
District Facility # S-8452
Project # S-1152865**

Dear Ms. Hart:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued S-8452-29-2 (under project S-1151246) into the Title V operating permit. The modification deletes an Ajax Model SGXB 50000 permit exempt heater and authorizes incineration of tank vapors in two new NSR exempt PEER units.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued S-8452-29-2, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Thank you for your cooperation in this matter.

Sincerely,


Arnaud Marjollet
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

TITLE V APPLICATION REVIEW

Minor Modification
Project #: S-1152865

Engineer: Robert Rinaldi
Date: September 22, 2015

Facility Number: S-8452
Facility Name: California Resources Production Corp
Mailing Address: 9600 Ming Ave., Suite 300
Bakersfield, CA 93311

RWK
9-29-15

Contact Name: Jennifer Hart
Phone: 661-869-8065

Responsible Official: Nick Goodman
Title: Operations Manager, Central Valey Operations

I. PROPOSAL

California Resources Production Corp (CRPC) is proposing a Title V minor permit modification to incorporate recently issued S-8452-29-2 (under project S-1151246) into the Title V operating permit. The modification deletes an Ajax Model SGXB 50000 permit exempt heater and authorizes incineration of tank vapors in two new NSR exempt PEER units.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

II. FACILITY LOCATION

The facility is located in the Heavy Oil Western Stationary Source at SW/4 Sec. 32, R11N, 19W.

III. EQUIPMENT DESCRIPTION

S-8452-29-2: 3000 BBL FIXED ROOF CRUDE OIL WASH TANK WITH VAPOR CONTROL SYSTEM SERVING TANKS S-8452-30, '-31, AND '-35

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

The tanks and vessels at the tank battery receive production prior to custody transfer. The 3000 bbl tank in this project operates as a wash tank.

VOC emissions from the tanks are controlled by a shared vapor control system in accordance with S-8452-29-2 permit conditions. The vapor control system collects vapors from the tanks and routes the uncondensed vapors to a VOC control device that reduces inlet VOC emissions by at least 99% by weight.

CRP has submitted an Authority to Construct (ATC) application to delete an Ajax Model SGXB 50000 permit exempt heater and authorize incineration of tank vapors in two new PEER units

The following condition on existing PTO S-8452-29-1 will be modified to accommodate the applicant's request.

1. VOC emissions from the tank headspace shall be collected by an operational vapor collection system shared among tanks S-8452-29, -30, -31, -35, and the free water knockout. Collected vapors shall be burned by either flare S-8452-32, steam generator S-8452-27, or Ajax Model SGXB 50000 permit exempt boiler equipment. [District Rule 2201] Y

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permits
- B. Authority to Construct
- C. Emissions Increases
- D. Application
- E. Previous Title V Operating Permit

ATTACHMENT A

Proposed Modified Title V Operating Permit

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-8452-29-3

EXPIRATION DATE: 03/31/2016

SECTION: SW32 **TOWNSHIP:** 11N **RANGE:** 19W

EQUIPMENT DESCRIPTION:

3000 BBL FIXED ROOF CRUDE OIL WASH TANK WITH VAPOR CONTROL SYSTEM SERVING TANKS S-8452-30, '-31, AND '-35

PERMIT UNIT REQUIREMENTS

1. VOC emissions from the tank headspace shall be collected by an operational vapor collection system shared among tanks S-8452-29, -30, -31, -35, and the free water knockout. Collected vapors shall be burned by either flare S-8452-32, steam generator S-8452-27, or permit exempt equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 99% by weight as determined by the test method specified in Rule 4623 Section 6.4.7. [District Rules 2201 and 4623, 5.6] Federally Enforceable Through Title V Permit
3. VOC emission rate from vapor service components associated with tank and vapor control system shall not exceed 0.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Permittee shall maintain with the permit accurate fugitive component counts and resulting emissions from tank using California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities Table IV-2C: Oil and Gas Production Screening Value Ranges (<10,000 ppmv) Emission Factors. [District Rule 2201] Federally Enforceable Through Title V Permit
5. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] Federally Enforceable Through Title V Permit
6. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit
7. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623] Federally Enforceable Through Title V Permit
8. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

9. Operator shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
10. Upon detection of a liquid leak, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
11. Components found to be leaking either liquids or gases shall be immediately affixed with a tag showing the component to be leaking. Operator shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
12. Leaking components that have been discovered by the operator that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3 shall not constitute a violation of this rule. Leaking components as defined by District Rule 4623 discovered by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3 shall constitute a violation of this rule. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
13. If a component type for a given tank is found to leak during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
14. Any component found to be leaking on two consecutive annual inspections is in violation of this rule, even if covered under the voluntary inspection and maintenance program. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
15. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rule 4623,] Federally Enforceable Through Title V Permit
16. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rules 2210 and 4623, 5.7, Table 3] Federally Enforceable Through Title V Permit
17. Permittee shall maintain records of annual tank inspections, maintenance, and cleaning to document the participation in the Rule 4623 Fixed Roof Tank Preventative Inspection, Maintenance and Tank Interior Cleaning Program. [District Rules 2210 and 4623, 5.7] Federally Enforceable Through Title V Permit
18. The operator shall keep accurate records of types, storage temperature, and Reid vapor pressure of liquids stored. The operator shall maintain monthly records of average daily throughput. Records shall be made available to District personnel upon request. [District Rule 4623, 6.3] Federally Enforceable Through Title V Permit
19. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623, 6.3 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
20. Formerly S-1326-373.

These terms and conditions are part of the Facility-wide Permit to Operate.

ATTACHMENT B

Authorities to Construct



AUTHORITY TO CONSTRUCT

PERMIT NO: S-8452-29-2

ISSUANCE DATE: 04/20/2015

LEGAL OWNER OR OPERATOR: CALIFORNIA RESOURCES PRODUCTION CORP

MAILING ADDRESS: 9600 MING AVENUE, SUITE 300
BAKERSFIELD, CA 93311

LOCATION: HEAVY OIL CENTRAL

SECTION: SW32 **TOWNSHIP:** 11N **RANGE:** 19W

EQUIPMENT DESCRIPTION:

MODIFICATION OF 3000 BBL FIXED ROOF CRUDE OIL WASH TANK WITH VAPOR CONTROL SYSTEM SERVING TANKS S-8452-30, -31, AND -35: DELETE AJAX MODEL SGXB 50000 PERMIT EXEMPT HEATER AND AUTHORIZE INCINERATION OF TANK VAPORS IN TWO NEW PEER UNITS

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. VOC emissions from the tank headspace shall be collected by an operational vapor collection system shared among tanks S-8452-29, -30, -31, -35, and the free water knockout. Collected vapors shall be burned by either flare S-8452-32, steam generator S-8452-27, or permit exempt equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 99% by weight as determined by the test method specified in Rule 4623 Section 6.4.7. [District Rules 2201 and 4623, 5.6] Federally Enforceable Through Title V Permit
4. VOC emission rate from vapor service components associated with tank and vapor control system shall not exceed 0.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Sayed Sadredin, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services

S-8452-29-2 Sep 22 2015 9:17AM -- RINALDIR : Joint Inspection Required with RINALDIR

5. Permittee shall maintain with the permit accurate fugitive component counts and resulting emissions from tank using California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities Table IV-2C: Oil and Gas Production Screening Value Ranges (<10,000 ppmv) Emission Factors. [District Rule 2201] Federally Enforceable Through Title V Permit
6. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] Federally Enforceable Through Title V Permit
7. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit
8. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623] Federally Enforceable Through Title V Permit
9. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
10. Operator shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
11. Upon detection of a liquid leak, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
12. Components found to be leaking either liquids or gases shall be immediately affixed with a tag showing the component to be leaking. Operator shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
13. Leaking components that have been discovered by the operator that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3 shall not constitute a violation of this rule. Leaking components as defined by District Rule 4623 discovered by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3 shall constitute a violation of this rule. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
14. If a component type for a given tank is found to leak during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
15. Any component found to be leaking on two consecutive annual inspections is in violation of this rule, even if covered under the voluntary inspection and maintenance program. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
16. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rule 4623,] Federally Enforceable Through Title V Permit
17. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rules 2210 and 4623, 5.7, Table 3] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

18. Permittee shall maintain records of annual tank inspections, maintenance, and cleaning to document the participation in the Rule 4623 Fixed Roof Tank Preventative Inspection, Maintenance and Tank Interior Cleaning Program. [District Rules 2210 and 4623, 5.7] Federally Enforceable Through Title V Permit
19. The operator shall keep accurate records of types, storage temperature, and Reid vapor pressure of liquids stored. The operator shall maintain monthly records of average daily throughput. Records shall be made available to District personnel upon request. [District Rule 4623, 6.3] Federally Enforceable Through Title V Permit
20. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623, 6.3 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
21. Formerly S-1326-373.

ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
S-8452-29-2	0	0	0	0	0
TOTAL					

ATTACHMENT D

Application

San Joaquin Valley Air Pollution Control District

www.valleyair.org

S-8452-29-3

RECEIVED

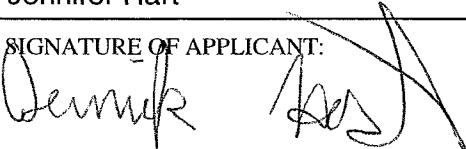
JUN 11 2015

Permit Application For:

SJVAPCD

Southern Region

☐ ADMINISTRATIVE AMENDMENT ☒ MINOR MODIFICATION ☐ SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: California Resources Production Corp		
2. MAILING ADDRESS: STREET/P.O. BOX: 9600 Ming Avenue, Suite 300 CITY: Bakersfield STATE: CA 9-DIGIT ZIP CODE: 93311		
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: Multiple Locations CITY: Heavy Oil Central (S-8452) ¼ SECTION TOWNSHIP RANGE		INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: Crude Oil and Natural Gas Production		
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Incorporate ATC S-8452-29-2 into Title V permit S-8452 - California Resources Production Corp. Heavy Oil Central Stationary Source.		
6. TYPE OR PRINT NAME OF APPLICANT: Jennifer Hart		TITLE OF APPLICANT: HSE Ops Advisor
7. SIGNATURE OF APPLICANT: 	DATE: 6/11/15	PHONE: 661-869-8065 FAX: 661-869-8170 EMAIL: jennifer.hart@crc.com

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ CHECK#: DATE PAID: PROJECT NO: S 1152865 FACILITY ID: S-8452
------------	--

RECEIVED

JUN 11 2015

**San Joaquin Valley
Unified Air Pollution Control District**

SJVAPCD
Southern Region

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)


- ☐ SIGNIFICANT PERMIT MODIFICATION ☐ ADMINISTRATIVE AMENDMENT
☒ MINOR PERMIT MODIFICATION

COMPANY NAME: California Resources Production Corp		FACILITY ID: S-8452
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility		
2. Owner's Name: California Resources Production Corp		
3. Agent to the Owner: Jennifer Hart		

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- ☒ Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- ☒ Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:



Signature of Responsible Official

6/11/15

Date

Nick Goodman

Name of Responsible Official (please print)

Operations Manager, Central Valley Operations

Title of Responsible Official (please print)

ATTACHMENT E

Previous Title V Operating Permit

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-8452-29-1

EXPIRATION DATE: 03/31/2016

SECTION: SW32 **TOWNSHIP:** 11N **RANGE:** 19W

EQUIPMENT DESCRIPTION:

3000 BBL FIXED ROOF CRUDE OIL WASH TANK WITH VAPOR CONTROL SYSTEM SERVING TANKS S-8452-30, '-31, AND '-35

PERMIT UNIT REQUIREMENTS

1. VOC emissions from the tank headspace shall be collected by an operational vapor collection system shared among tanks S-8452-29, -30, -31, -35, and the free water knockout. Collected vapors shall be burned by either flare S-8452-32, steam generator S-8452-27, or Ajax Model SGXB 50000 permit exempt boiler. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 99% by weight as determined by the test method specified in Rule 4623 Section 6.4.7. [District Rules 2201 and 4623, 5.6] Federally Enforceable Through Title V Permit
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8. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit

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These terms and conditions are part of the Facility-wide Permit to Operate.

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16. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rules 2210 and 4623, 5.7, Table 3] Federally Enforceable Through Title V Permit
17. Permittee shall maintain records of annual tank inspections, maintenance, and cleaning to document the participation in the Rule 4623 Fixed Roof Tank Preventative Inspection, Maintenance and Tank Interior Cleaning Program. [District Rules 2210 and 4623, 5.7] Federally Enforceable Through Title V Permit
18. The operator shall keep accurate records of types, storage temperature, and Reid vapor pressure of liquids stored. The operator shall maintain monthly records of average daily throughput. Records shall be made available to District personnel upon request. [District Rule 4623, 6.3] Federally Enforceable Through Title V Permit
19. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623, 6.3 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
20. Formerly S-1326-373.

These terms and conditions are part of the Facility-wide Permit to Operate.